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Attorneys for Defendant Solana Labs, Inc.

Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

MARK YOUNG, on behalf of himself and all
 others similarly situated,

Plaintiff,

v.

SOLANA LABS, INC., THE SOLANA
 FOUNDATION, ANATOLY
 YAKOVENKO, MULTICOIN CAPITAL
 MANAGEMENT LLC, KYLE SAMANI, and
 FALCONX LLC,

Defendants.

Case No.: 3:22-cv-03912-RFL

**STIPULATION AND [PROPOSED]
 ORDER CONTINUING DEFENDANTS'
 TIME TO RESPOND TO CONSOLIDATED
 AMENDED CLASS ACTION COMPLAINT**

(Civil L.R. 6-1, 6-2, 7-12)

Hon: Rita F. Lin

Pursuant to Civil Local Rules 6-1 and 6-2, Lead Plaintiff Mark Young (“Plaintiff”), Defendants Solana Labs, Inc. (“Solana Labs”), Multicoin Capital Management LLC (“Multicoin”) and Kyle Samani (together with Solana Labs and Multicoin, “Defendants”, and collectively with Plaintiff, the “Parties”), by and through their respective counsel, hereby stipulate as follows:

WHEREAS, on January 12, 2024, Plaintiff filed his Consolidated Amended Class Action Complaint (“Amended Complaint”) (Dkt. 68);

WHEREAS, pursuant to the Court’s December 21, 2023 Order, the last day for Defendants to file their respective responses to the Amended Complaint is March 12, 2024, Plaintiff’s last day to respond to the anticipated motion(s) to dismiss is April 11, 2024, and Defendants’ last day to file replies in support of their anticipated motions to dismiss is May 13, 2024 (Dkt. 67); thus far, these are the only deadlines that have been set in this Action;

WHEREAS, no extensions have been requested or granted, and the Court has not stated that further extensions will not be granted;

WHEREAS, since the filing of the Amended Complaint, the Parties have engaged in a productive meet and confer process in an attempt to narrow the issues in dispute and minimize any overlap in the Defendants’ respective responses to the Amended Complaint;

WHEREAS, the Parties anticipate that Solana Labs will file a motion to dismiss the Amended Complaint, and Multicoin and Samani will jointly file a separate motion to dismiss, with each motion focusing as much as possible on issues and allegations unique to the respective Defendants;

WHEREAS, in the interest of efficiency and in recognition of the potential to narrow the issues further, the Parties have conferred and respectfully request that the Court extend the deadlines;

IT IS ACCORDINGLY STIPULATED, by and between the undersigned counsel for the parties, that subject to the Court’s approval:

1. Solana Labs and Multicoin and Samani shall file their respective responses to the Amended Complaint on or before April 11, 2024;

2. Lead Plaintiff shall file its opposition(s) to the anticipated motions to dismiss on or before May 13, 2024;

3. Defendants shall file their replies in support of their respective motion(s) to dismiss on or before June 12, 2024.

DATED: February 13, 2024

LATHAM & WATKINS LLP

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Attorneys for Defendant Solana Labs, Inc.

DATED: February 13, 2024

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*Counsel for Plaintiff Mark Young and the
Proposed Class*

DATED: February 13, 2024

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*Attorneys for Defendants Multicooin Capital
Management, LLC and Kyle Samani*

1 PURSUANT TO STIPULATION, IT IS SO ORDERED

2
3 DATED:

4 Hon. Rita F. Lin
5 United States District Court Judge
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SIGNATURE ATTESTATION

I am the ECF User whose identification and password are being used to file the foregoing Stipulation and [Proposed] Continuing Defendants' Time to Respond to Consolidated Amended Class Action Complaint. Pursuant to L.R 5-1(i)(3) regarding signatures, I, Morgan Whitworth, attest that concurrence in the filing of this document has been obtained.

DATED: February 13, 2024

/s/Morgan E. Whitworth

Morgan E. Whitworth